

EXHIBIT A

Part 573 Safety Recall Report

Case 2:22-cv-01154-MGE-CKD Document 1-1 Filed 07/01/22 Page 2 of 11

Manufacturer Name : Ford Motor Company

Submission Date : JUN 10, 2022

NHTSA Recall No. : 22V-412

Manufacturer Recall No. : 22S41



Manufacturer Information :

Population :

Manufacturer Name : Ford Motor Company

Number of potentially involved : 48,924

Address : 330 Town Center Drive
Suite 500 Dearborn MI 48126-2738

Estimated percentage with defect : 100 %

Company phone : 1-866-436-7332

Vehicle Information :

Vehicle 1 : 2021-2022 Ford Mustang Mach-E

Vehicle Type : LIGHT VEHICLES

Body Style : ALL

Power Train : NR

Descriptive Information : The recalled Secondary On-Board Diagnostic Control Module (SOBDMC) and the Battery Energy Control Module (BECM) software were introduced into production on 05/27/2020 and was taken out of production on 05/24/2022.

These vehicles are not produced in VIN order. Information as to the applicability of this action to specific vehicles can best be obtained by either calling Ford's toll-free line (1-866-436-7332) or by contacting a local Ford or Lincoln dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database.

Production Dates : MAY 27, 2020 - MAY 24, 2022

VIN Range 1 : Begin :

NR

End : NR

☐ Not sequential

Description of Defect :

Description of the Defect : Direct Current ("DC") fast charging and repeated wide open pedal events can cause the high voltage battery main contactors to overheat. Overheating may lead to arcing and deformation of the electrical contact surfaces, which can result in a contactor that remains open or a contactor that welds closed.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : An overheated contactor that opens while driving can result in a loss of motive power, which can increase the risk of an accident.

Description of the Cause : The design and part-to-part variation of the high voltage battery main

Identification of Any Warning that can Occur : contactor is not robust to the heat generated during DC fast charging and multiple wide open pedal events.

If the contactor opens while driving, a powertrain malfunction warning light will be illuminated and the vehicle will display “Stop Safely Now” in the cluster when the vehicle experiences an immediate loss of motive power. Should the contactors weld closed while driving, a powertrain malfunction warning light will be illuminated on the next drive cycle, along with a no start condition.

Involved Components :

Component Name 1 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R19 – 3P AWD

Component Part Number : LJ98-14G069-FR

Component Name 2 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R19 – 3P RWD

Component Part Number : LJ98-14G069-ER

Component Name 3 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R19 – 4P AWD

Component Part Number : LJ98-14G069-DR

Component Name 4 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R19 – 4P RWD

Component Part Number : LJ98-14G069-CR

Component Name 5 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R30 – 3P AWD

Component Part Number : LJ98-14G069-FS

Component Name 6 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R30 – 3P RWD

Component Part Number : LJ98-14G069-ES

Component Name 7 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R30 – 4P AWD

Component Part Number : LJ98-14G069-DS

Component Name 8 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R30 – 4P RWD

Component Part Number : LJ98-14G069-CS

Component Name 9 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R31/R32 – 3P AWD

Component Part Number : LJ98-14G069-FT

Component Name 10 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R31/R32 – 3P RWD

Component Part Number : LJ98-14G069-ET

Component Name 11 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R31/R32 – 4P AWD

Component Part Number : LJ98-14G069-DT

Component Name 12 : Secondary On-Board Diagnostic Control Module Softw

Component Description : R31/R32 – 4P RWD

Component Part Number : LJ98-14G069-CT

Component Name 13 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R33 – 3P AWD
 Component Part Number : LJ98-14G069-FU

Component Name 14 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R33 – 3P RWD
 Component Part Number : LJ98-14G069-EU

Component Name 15 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R33 – 4P AWD
 Component Part Number : LJ98-14G069-DU

Component Name 16 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R33 – 4P RWD
 Component Part Number : LJ98-14G069-CU

Component Name 17 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R41 – 3P AWD
 Component Part Number : LJ98-14G069-AXB

Component Name 18 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R41 – 3P RWD
 Component Part Number : LJ98-14G069-AZB

Component Name 19 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R41 – 4P AWD
 Component Part Number : LJ98-14G069-BBB

Component Name 20 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R41 – 4P RWD
 Component Part Number : LJ98-14G069-BDB

Component Name 21 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R42/R43 – 3P AWD
 Component Part Number : LJ98-14G069-AXC

Component Name 22 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R42/R43 – 3P RWD
 Component Part Number : LJ98-14G069-AZC

Component Name 23 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R42/R43 – 4P AWD
 Component Part Number : LJ98-14G069-BBC

Component Name 24 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R42/R43 – 4P RWD
 Component Part Number : LJ98-14G069-BDC

Component Name 25 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 – 3P AWD
 Component Part Number : LJ98-14G069-AXD

Component Name 26 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 – 3P RWD
 Component Part Number : LJ98-14G069-AZD

Component Name 27 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 – 4P AWD
 Component Part Number : LJ98-14G069-BBD

Component Name 28 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 – 4P RWD
 Component Part Number : LJ98-14G069-BDD

Component Name 29 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 SR1 – 3P AWD
 Component Part Number : LJ98-14G069-AXE

Component Name 30 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 SR1 – 3P RWD
 Component Part Number : LJ98-14G069-AZE

Component Name 31 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 SR1 – 4P AWD
 Component Part Number : LJ98-14G069-BBE

Component Name 32 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 SR1 – 4P RWD
 Component Part Number : LJ98-14G069-BDE

Component Name 33 : Secondary On-Board Diagnostic Control Module Softw
 Component Description : R44 SR2/SR3 – 3P AWD
 Component Part Number : LJ98-14G069-AXF

Component Name 34 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR2/SR3 – 3P RWD
Component Part Number : LJ98-14G069-AZF

Component Name 35 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR2/SR3 – 4P AWD
Component Part Number : LJ98-14G069-BBF

Component Name 36 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR2/SR3 – 4P RWD
Component Part Number : LJ98-14G069-BDF

Component Name 37 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR4 – 3P AWD
Component Part Number : LJ98-14G069-AXG

Component Name 38 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR4 – 3P RWD
Component Part Number : LJ98-14G069-AZG

Component Name 39 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR4 – 4P AWD
Component Part Number : LJ98-14G069-BBG

Component Name 40 : Secondary On-Board Diagnostic Control Module Softw
Component Description : R44 SR4 – 4P RWD
Component Part Number : LJ98-14G069-BDG

Component Name 41 : Battery Energy Control Module Software

Component Description : R19/R30 – 3P

Component Part Number : LJ98-14C197-AF

Component Name 42 : Battery Energy Control Module Software

Component Description : R19/R30 – 4P

Component Part Number : LJ98-14C197-BF

Component Name 43 : Battery Energy Control Module Software

Component Description : R31/R32/R33 – 3P

Component Part Number : LJ98-14C197-AG

Component Name 44 : Battery Energy Control Module Software

Component Description : R31/R32/R33 – 4P

Component Part Number : LJ98-14C197-BG

Component Name 45 : Battery Energy Control Module Software

Component Description : R41/R42 – 3P

Component Part Number : LJ98-14C197-AH

Component Name 46 : Battery Energy Control Module Software

Component Description : R41/R42 – 4P

Component Part Number : LJ98-14C197-BH

Component Name 47 : Battery Energy Control Module Software

Component Description : R43/R44 – 3P

Component Part Number : NJ98-14C197-AA

Component Name 48 : Battery Energy Control Module Software

Component Description : R43/R44 – 4P

Component Part Number : NJ98-14C197-BA

Component Name 49 : Battery Energy Control Module Software

Component Description : R44 SR1/SR2/SR3/SR4 – 3P

Component Part Number : NJ98-14C197-AB

Component Name 50 : Battery Energy Control Module Software

Component Description : R44 SR1/SR2/SR3/SR4 – 4P

Component Part Number : NJ98-14C197-BB

Supplier Identification :

Component Manufacturer

Name : Ford Motor Company

Address : One American Road
Dearborn Michigan 48126

Country : United States

Chronology :

On April 12, 2022, an issue pertaining to high voltage battery main contactor overheating was brought to Ford's Critical Concern Review Group for review.

In April and May of 2022, Ford investigated warranty claims to quantify performance differences between vehicle variants. Ford conducted a read-across of other vehicle lines utilizing high voltage battery contactors.

Between July 13, 2021 and May 31, 2022, there have been 286 warranty claims in North America related to an open or welded contactor. Ford is aware of one VOQ alleging a no-start and listing DTCs related to this concern.

On June 3, 2022, Ford's Field Review Committee reviewed the concern and approved a field action.

Ford is not aware of any reports of accident or injury related to this condition.

Description of Remedy :

Description of Remedy Program : The remedy for this program is a Secondary On-Board Diagnostic Control Module (SOBDMC) and Battery Energy Control Module (BECM) software update. Ford is anticipated to begin Over-The-Air (OTA) deployment to update the SOBDMC an BECM software for affected vehicles in July 2022. Alternatively, owners will have the option to take their vehicle to a Ford or Lincoln dealer to complete the software update. There will be no charge for this service.

Ford provided the general reimbursement plan for the cost of remedies paid for by vehicle owners prior to notification of a safety recall in May 2021. The ending date for reimbursement eligibility is estimated to be January 31, 2023

Ford will forward a copy of the notification letters to dealers to the agency when available.

How Remedy Component Differs from Recalled Component : The updated SOBDMC software (LJ98-14G069-AXG, LJ98-14G069-AZG, LJ98-14G069-BBG, LJ98-14G069-BDG) will monitor contactor temperature and intelligently reduce battery power to prevent damage to the contactor. The updated BECM software (NJ98-14C197-AE, NJ98-14C197-BD) will monitor contactor resistance to identify an overheated contactor and reduce vehicle power to prevent further damage.

Identify How/When Recall Condition was Corrected in Production : The updated SOBDMC software and BECM software was introduced into production on May 25, 2022.

Recall Schedule :

Description of Recall Schedule : Notification to dealers is expected to occur on June 13, 2022. Mailing of owner notification letters is expected to begin July 18, 2022 and is expected to be completed by July 22, 2022.

Planned Dealer Notification Date : JUN 13, 2022 - JUN 13, 2022

Planned Owner Notification Date : JUL 18, 2022 - JUL 22, 2022

* NR - Not Reported